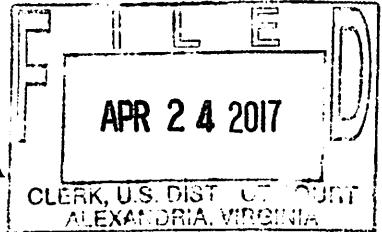


UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division



ALEXANDER OTIS MATTHEWS,  
plaintiff,

v.

ESTRATEGIA INVESTIMENTOS, S.A., *et al.*

CIVIL ACTION NO. 14-cv-00207-LO-MSN

**DECLARATION OF ANDRÉS RIVERO**

I, Andrés Rivero, declare as follows:

1. I am the managing partner of Rivero Mestre LLP ("RM"). I have been practicing law for more than 30 years, including as a federal prosecutor and a litigation partner at the Greenberg Traurig firm. I have been a member in good standing of the Florida Bar throughout those years. I make this declaration based on my personal knowledge.

2. RM does not represent any party to this action.

3. RM represents Pablo Antoniazzi ("Mr. Antoniazzi") in another lawsuit. Mr. Antoniazzi used to be an officer of Estrategia Investimentos, S.A., but he has not had any role with that company since May 5, 2016.

4. Indeed, the Brazilian government took control of Estrategia Investimentos, S.A. On May 5, 2016. *See Banco Central Do Brasil, Ato do Presidente* [Central Bank of Brazil, Act of the President] No. 1,321 (May 5, 2016),

<http://www.bcb.gov.br/pre/normativos/busca/normativo.asp?numero=1321&tipo=Ato%20do%20Presidente&data=5/5/2016>; and *Banco Central Do Brasil, Consulta da empresa - Posição atual* [Central Bank of Brazil, Report on Current Status of Estrategia Investimentos, S.A.],

<http://www4.bcb.gov.br/Lid/Liquidacao/empresa.asp?pessoalId=100160> (last visited May 17, 2017), enclosed as Composite Exhibit A.

5. On April 5, 2017, Deputy U.S. Marshal David Shimko (the “Marshal”) tried to reach Mr. Antoniazzi at his office and left a business card for Mr. Antoniazzi to contact him. The same day, Mr. Antoniazzi called me and sent me the Marshal’s contact information by email.

6. On April 6, 2017, I spoke with the Marshal. I understood that he was trying to attempt service on Mr. Antoniazzi. I agreed to accept service for Mr. Antoniazzi.

7. On April 7, 2017, the Marshal handed me the summons and complaint in the case of reference and I accepted service on behalf of Mr. Antoniazzi. Later, a colleague read the complaint and realized that Mr. Antoniazzi is not a named defendant. I called the Marshal that same day and explained that RM does not represent and is not authorized to accept service for the named defendant, Estrategia Investimentos, S.A.

8. On April 10, 2017, the Marshal filed a return of service stating that on April 7, 2017, he had “personally served attorney Andrés Rivero who is representing Estrategia Investimentos and said he is authorized to accept service.” [D.E. 24] This is not correct. I never told the Marshal that I was representing Estrategia, or that I was authorized to accept service for it.

9. I only accepted service of the summons and complaint in the matter of reference on the understanding that Mr. Antoniazzi was a named defendant. RM does not represent and is

not authorized to accept service on behalf of Estrategia Investimentos, S.A.

I declare under penalty of perjury under 28 U.S.C. § 1746 that what I have declared here is true and correct.

Dated: April 20, 2017

  
Andrés  
Andrés Rivero